REMARKS/ARGUMENTS

Status of the Claims

Applicant notes with thanks the establishment of an RCE in this case and the Examiner's continuing attention to this case.

In the amendment filed with the RCE request, claims 5-8, 11, and 16-32 were cancelled and claims 33-44 were added. Thus, claims 1-4, 9, 10, 12-15, and 33-44 are pending. All claims but 44 stand rejected, in light of Vaios combined with other art. Applicant has extensively argued that the Examiner is asserting that Vaios discloses elements that are simple not present in Vaios. The Examiner has not addressed these arguments. Applicant reaffirms all arguments made to the examiner's previous rejection with reference to Vaios and other art. Applicant furthermore responds as indicated below.

The Claimed Invention

The present invention involves surveillance systems using information processing technologies. In contrast to the art cited by the Examiner, the present invention uses image analysis, in particular from multiple digital cameras, for determining whether an incident has occurred. In further embodiments, multiple cameras are associated with different camera coordinators for initial image analysis to determine if an incident has occurred.

United States Patent N° 6,271,752 B2 (Vaios)

In the present office action, the Examiner again relies on Vaios. Nothing in Vaios suggests using an information system to determine if an incident has occurred by analyzing image data. Furthermore, nothing in Vaios suggests using an information system to determine if an image is of interest by analyzing image data from multiple cameras. Furthermore, Vaios teaches away from the claimed invention in that **Vaios teaches that determining camera video output that is of interest is accomplished by a motion sensor**, rather than by any image analysis. The claimed invention, in contrast, is directed to analyzing images, including analyzing images from multiple cameras, to determine when image data is of interest.

United States Patent N° 6,271,752 B2 (Vaios)

Vaios discusses a multi-access remote system with a surveillance area and a plurality of end user locations (Abstract). This most discussed embodiment is one surveillance area with many possible viewers/controllers systems, with a computer 12 shown locally at the single surveillance area. (See Fig. 1.) Fig. 2 shows a remote computer 16. The background section discusses that the need addressed by Vaios is a small business operation, where a single business site may need to be monitored by a variety of employees that move around and do not have access to special cabling. (Col. 1: line 46-67.) The basic architecture described is a local computer system 12 with a camera adapter and a camera that can be accessed by multiple viewers. (Col. 4: line 5-14.) End-user computers 16 are shown in Fig. 1 as providing a browser or other viewer interface for viewing images.

Vaios briefly mentions that "there may be multiple cameras or multiple surveillance areas as well, or even alternative monitoring devices that record data other than video, such as sound, heat, pressure, and fingerprints." (Col. 9: line 31-34.). Vaios furthermore discusses a mechanism for serving individuals with low-bandwidth connections to the Internet. In the proposed embodiment, the local computer system captures, from the camera, a predetermined length of video...and transmits this data file to the remote user, whereby the downloaded video is played in high quality. (Col. 9: line 10-26.).

Nothing in Vaios suggests using an intermediate image server for capturing and storing camera data and making that data available to a plurality of users. Vaios instead describes a system and method where each remote user makes a separate connection directly to a camera system. Among other places, this is particularly described in Vaios claim 17, "establishing a plurality of **independent connections between one or more of said end user computer systems and said monitoring computer system via said communications network"** (Col. 11: line 34-37.).This is also shown in Fig 1, and is the configuration discussed throughout the Vaios.

The present invention, by contrast, teaches that image capture systems are first connected to an image server system. This provides a number of advantages, as described in the application, for example allowing many users to view the same image from a single

surveillance system without overwhelming the bandwidth capabilities of an individual surveillance system.

Thus, there is no basis for the examiner's assertion that Vaios teaches "transmitting the sequence to an image server (col. 3, lines 24-26);" The computer discussed in the cited passage of Vaios is clearly the local computer directly connected to a camera and as it corresponds to the "camera coordinator" of the present invention. Both the written description, figures, and claims of the present invention make clear that the invention includes an "image server" that receives and stores images from at least one remote camera and then provides those images to users. Vaios no where hints at or suggests this capability and in fact specifically teaches away in stating that cameras make separate and independent connections to end users.

In the present Office Action, the Examiner has made the following assertions regarding elements of the rejected claims allegedly disclosed by Vaios. Each is traversed as indicated below.

(1) "[A]t the camera, capturing a plurality of still frames and generating a sequence of digital image data sets representing perceptible images (Fig. 4, 306)." Applicant traverses and does not understand the Examiner's statement. The indicated Fig. 4, 306 is a flow chart block, stating in full "COMPUTER SYSTEM RECEIVES A WAKE-UP CALL AND THE VIDEO CAMERA STARTS RECORDING." Applicant finds no suggestion here of "capturing a plurality of still frames and generating a sequence of digital image data sets."

(2) "[A]t the camera, transmitting the sequence to a camera coordinator (12), the coordinator receiving digital image data set sequences from the (sic) camera." Applicant's claim indicates multiple cameras. Applicant traverses. This most discussed embodiment in Vaios is one surveillance area with many possible viewers/controllers systems, with a computer 12 shown locally at the single surveillance area. The background section discusses that the need addressed is a small business operation, where a single business site may need to be monitored by a variety of employees that move around and do not have access to special cabling. (Col. 1: line 46-67.)

In the proposed embodiment, the local computer system captures, from the camera, a predetermined length of video...and transmits this data file to the remote user, whereby the downloaded video is played in high quality. (Col. 9: line 10-26.).

Thus, local computer 12 of Vaios does not anticipate a camera coordinator as described in the claimed invention. The Examiner has not provided any support for making this equivalence.

(3) "[A]t the camera coordinator, determining the incident (Fig. 4, 306, 308):" Applicant traverses. The indicated Fig. 4, 306 as described above is a flow chart block, stating in full "COMPUTER SYSTEM RECEIVES A WAKE-UP CALL AND THE VIDEO CAMERA STARTS RECORDING." Likewise, 308 states in full "THE VIDEO CAMERA APPROPRIATELY TRACKS A MOVING OBJECT, FOCUSES THE IMAGE, AND TRANSMITS THE RECORDED DATA TO THE LOCAL COMPUTER SYSTEM FOR STORAGE AND OTHER ACTIVITIES" The subject element of Applicants claim 1 states, "at said camera coordinator, determining, using said digital image data set sequences, whether an incident is associated with one or more frames in said sequence and/or one or more cameras;" This is absolutely not disclosed in Vaios. As Applicant has repeatedly stated, Vaios relies on a motion sensor (See 304). The motion sensor is part of the video camera (See Abstract and throughout Vaios.) Thus, even if the Vaios local computer 12 was considered equivalent to an image coordinator, it is not that computer that determines through image analysis if an incident has occurred. An incident is simply determined by a motion sensor on a video camera.

(4) "[F]rom the camera coordinator transmitting the sequences of image data comprising datasets of interest over a network to an image server, (Fig. 4, 310-314):" Applicant traverses. The indicated Fig. 4 flow chart blocks do not, in fact, mention an image server or any element that could be considered analogous to an image server. The flow chart states, quite specifically, that the data is stored at the local computer system and remains there until accessed by an end user. The Examiner has entirely failed to show how the reference anticipates or makes obvious this element.

(5) "[S]toring one or more sequences to an image server (14);" Applicant traverses. The indicated 14 is a network interface, and not a server of any kind. Should the

Examiner have meant (16), this is indicated as "Remote computer systems 16 of end user locations 8" and is not indicated as an image server or anything analogous. Should the Examiner be referring to the database shown connected to 16, there is no indication in Vaios that this database stores image data or that this database stores data that is remotely accessible to a number of users, as described for the image server. Vaios repeatedly states that any storage of image data takes place at the local computer 12.

All of the Examiner's remaining rejections are moot in light of the fact that Vaios does not disclose each of the elements discussed above. Applicant reserves the right to

The Examiner is respectfully reminded that it the Examiner's burden to provide evidence for any asserted combination in the cited art.

In view of the foregoing, Applicants believe all claims now pending in this application are in condition for allowance. Applicants respectfully request that a timely Notice of Allowance be issued in this case. If after consideration of this amendment, the Examiner does not agree that all claims are in condition for allowance, a telephone conference with the Examiner is hereby requested. Please telephone Stephen J. LeBlanc at (510) 769-3508.

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